

1 NOEL M. COOK, SBN 122777
2 LINDA JOY KATTWINKEL, SBN 164283
3 ALICA DEL VALLE, SBN 246006
4 OWEN, WICKERSHAM & ERICKSON, P.C.
5 455 Market Street, Suite 1910
6 San Francisco, California 94105
(415) 882-3200 Tel
(415) 882-3232 Fax
ncook@owe.com
ljk@owe.com
adelvalle@owe.com

7 Attorneys for Plaintiffs
8 SANRIO COMPANY, LTD. and SANRIO, INC.

9
10 UNITED STATES DISTRICT COURT
11
12 NORTHERN DISTRICT OF CALIFORNIA

13 SANRIO COMPANY, LTD., a Japanese
14 corporation and SANRIO, INC., a California
corporation,

15 Plaintiffs,

16 vs.

17 J.I.K. Accessories, Inc., Accessitive
18 Accessories, Inc., B.B. Apparels Inc., Amuseco
Accessories, Inc., Nana Accessory, Inc., Seanna
Corporation, Heiress Enterprises, Inc., Pinkland
Corporation, Inc., Bliss, Final Choice, Joon Sik
Bae, Yong Woo Kim, Any Bae, Jason Bae,
Brian Ban, Ryan Bae, Ho Yong Na, Sang Wha
Kim, Aeran Bae a/k/a Chris Bae, Jenny J. Lee,
Sukmin Bae, John Bae, Lisa Bae, Grace Kim,
Ken Chung, Yeun Sik Cha, Debbie Kim, DOES
1- 10,

19 Defendants

20 Civil Action No. C 09-00440 MHP

21 STIPULATION TO EXTEND
22 DISCOVERY DEADLINES;
[PROPOSED] ORDER

23 Counsel for plaintiffs Sanrio Company, Ltd. and Sanrio, Inc. ("Plaintiffs") and
24 defendants that currently remain in the case respectfully submit this stipulation requesting an
25 extension of time for discovery and other dates as follows.
26
27

1 WHEREAS, the undersigned parties participated in mediation on August 25, 2010,
2 during which significant progress was made toward settlement;

3 WHEREAS, on September 10, 2010, this Court granted the parties' stipulation to stay
4 discovery until November 15, 2010, and to extend discovery deadlines to give the parties time
5 to continue settlement negotiations;

6 WHEREAS, the current deadline to complete fact discovery is February 28, 2011;

7 WHEREAS, the parties have been working diligently with the mediator to set a date
8 for continued mediation, but certain insurance carriers for defendants have been unable or
9 unwilling to agree to any of the mediation dates proposed so far;

10 WHEREAS, a new mediation session, with at least some of the parties, has been
11 tentatively scheduled for February 28, 2011;

12 WHEREAS, the parties have served some discovery requests, and certain defendants
13 have requested additional time to respond thereto;

14 WHEREAS, plaintiffs are willing to extend the deadlines for defendants' discovery
15 responses, but would need additional time for follow-up discovery and depositions once
16 defendants' responses are received (if the case does not settle);

17 WHEREAS, counsel for all of the parties agree that extending the discovery deadlines as
18 requested herein would increase the likelihood of scheduling a second mediation and reaching a
19 successful settlement;

20 WHEREAS, counsel for all of the parties request that discovery and other deadlines be
21 extended accordingly;

22 NOW, THEREFORE, by and through their counsel, the undersigned Parties hereby
23 stipulate and request the Court to order as follows:

24 1. Discovery and other deadlines shall be extended, with the new deadlines to be as
25 follows:

26 Last day to serve fact discovery: April 29, 2011

27

28

1 Expert disclosure: April 29, 2011
2 Rebuttal expert reports due: May 16, 2011
3 Last day to serve expert discovery: June 29, 2011
4 Dispositive motions hearing: ~~September 8, 2011~~ September 12, 2011 @ 2:00 p.m.
5 Trial: ~~October 10, 2011~~ or as soon thereafter as the
6 October 11, 2011 at 8:30 a.m.
7 Court's calendar permits.

8 IT IS SO STIPULATED.

9 OWEN, WICKERSHAM & ERICKSON, P.C.

10 Date: January 26, 2011 By: /s/ Noel M. Cook
11 NOEL M. COOK
12 LINDA JOY KATTWINKEL
13 Attorneys for Plaintiffs
14 SANRIO COMPANY, LTD., and SANRIO, INC.

15 BLEDSOE, CATHCART, DIESTEL,
16 PEDERSEN & TREPPA, LLP

17 Date: January 26, 2011 By: /s/ L. Jay Pedersen
18 L. JAY PEDERSEN
19 JOSHUA N. ROSEN
20 Attorneys for Defendant
21 ACCESSITIVE ACCESSORIES, INC.

22 TINGLEY PIONTKOWSKI LLP

23 Date: January 26, 2011 By: /s/ Bruce Pointkowski
24 BRUCE C. POINTKOWSKI
25 JONATHAN A. MCMAHON
26 Attorney for Defendants
27 J.I.K. ACCESSORIES, INC.
28 ACCESSITIVE ACCESSORIES, INC.
 B.B. APPARELS INC.
 AMUSECO ACCESSORIES, INC.
 JOON SIK BAE, ANDY BAE, and BRIAN BAE

1 LEACH AND MCGREEVY
2

3 Date: January 26, 2011
4

5 By: /s/ Richard E. McGreevy
6 RICHARD E. MCGREEVY
7 BRIAN LEACH
8 Attorney for Defendants
9 JOHN BAE AND AERON BAE,
10 DBA BLISS AND FINAL CHOICE
11

12 IT IS SO ORDERED
13

14 Dated: January 27, 2011.
15

16 HON. MARILYN H. PATEL
17 U.S. DISTRICT JUDGE
18



19 S:\1Clients\SANRI\LITIGA\70017\Pleadings\Stipulation To Extend Discovery Deadline 1-17-11.doc
20
21
22
23
24
25
26
27
28